

# Federal Defenders OF NEW YORK, INC.

Southern District  
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August 10, 2020

**BY ECF**

Honorable William H. Pauley, III  
United States District Judge  
Southern District of New York  
500 Pearl Street,  
New York, New York 10007

Re: United States v. Allen Lawrence  
20 Cr. 272 (WHP)

Application granted.

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

Dear Judge Pauley,

August 10, 2020

I respectfully write on behalf of my client, Allen Lawrence, to request that Mr. Lawrence be given permission, on Monday, August 10, 2020, to travel to Beaufort, North Carolina, in order to care for his elderly father. His father, who is 88 years old, just contracted COVID-19, and therefore requires care. Mr. Lawrence had COVID-19 in late March, and recently tested for a high count of COVID-19 antibodies. As a result, Mr. Lawrence is best fit to care for his father. His older brother hasn't contracted the illness, and suffers from severe respiratory problems. Mr. Lawrence will depart New York City at 4:30 PM on August 10<sup>th</sup>, and arrive in New Bern, North Carolina at 9:30 PM on August 10<sup>th</sup>. He will then rent a car, and drive to his father's house (approximately 45 minutes from the airport in New Bern). He will reside with his father at 2411 Front Street, Unit B9, Beaufort, North Carolina, 28516. Mr. Lawrence will return to New York City in two weeks, on August 24<sup>th</sup>, 2020. Both Pre-Trial Services (PTS) and the Government have no objection to this request.

On November 11<sup>th</sup>, 2019, Your Honor ordered the following bail conditions for Mr. Lawrence: \$50,000 PRB; 2 FRP; Travel restricted to SDNY/EDNY; Surrender all Travel Documents and make no new applications; Pretrial Supervision as directed by PTS; Drug Testing/Treatment by PTS; Mental Health Treatment as directed by PTS; Curfew; Electronic Monitoring; Def. not to possess firearm/destructive device/other weapon; All authorized computers including smartphones or tablets, are subject to monitoring and examination by PTS; No contact with minors without an adult supervising; No contact with alleged victims or witnesses; No possession, subscription, or viewing of any media depicting children in the nude and/or sexually explicit positions. Since his release, Mr. Lawrence has carefully followed all the conditions of his bond.

Respectfully submitted,  
/s/  
Mark Gombiner  
Assistant Federal Defender  
212-417-8718

cc: All counsel on record (ECF)  
John Moscato (PTSO)